

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

Lei-Le Isaura Jade Christenson and Caleb Retelle,

Plaintiffs,

25-cv-445-jdp

v.

Wexford Ridge Apartments and Wexford Management, LLC,

Defendants.

Case No.: [Leave Blank – To be assigned]

NOTICE OF REMOVAL

TO: The Judges of the United States District Court for the Western District of Wisconsin

AND TO: All Parties and Counsel of Record

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Plaintiffs Lei-Le Isaura Jade Christenson and Caleb Retelle hereby give notice of the removal of this action to the United States District Court for the Western District of Wisconsin, and in support thereof, state as follows:

1. Plaintiffs originally initiated this action through communications, complaints, and evidence served to the Defendants, identifying extensive violations of tenant rights, federal housing standards, and constitutional protections.
2. This Court has original jurisdiction under 28 U.S.C. § 1331 (Federal Question), as this action arises under the United States Constitution and federal civil rights statutes, including but not limited to:
 - o 42 U.S.C. § 1983
 - o Federal Housing Act (FHA)
 - o Americans with Disabilities Act (ADA) (where applicable)

- Violations of the Due Process Clause and Equal Protection Clause
3. The claims further incorporate violations of state laws including Wis. Stat. § 704.07, Wis. Admin. Code ATCP 134, and relevant portions of the Wisconsin Tenant Protection Act, which intersect with federal housing rights and constitutional guarantees.
 4. Plaintiffs are pursuing injunctive relief, monetary damages, relocation support, and court-ordered inspections due to the Defendants' failure to provide habitable, safe living conditions.
 5. This notice is timely under 28 U.S.C. § 1446(b), as this action has only now become subject to federal jurisdiction by virtue of Plaintiffs completing all prerequisites to federal filing and exhausting administrative options.
 6. Plaintiffs will promptly serve a copy of this Notice of Removal to the Defendants and file a copy with any state or local administrative bodies involved, as required.

WHEREFORE, Plaintiffs request that the United States District Court for the Western District of Wisconsin assume full jurisdiction over this action pursuant to federal law.

Respectfully submitted,

Dated: 04/24/2025

/s/ Lei-Le Isaura Jade Christenson

Plaintiff, Pro Se

/s/ Caleb Retelle

Plaintiff, Pro Se